

United States District Court for the  
Western District of Washington

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Seattle, WA 98101  
(206) 370-8400

ANDREW U. D. STRAW,	)	Case No.: 2:20-cv-00294-JLR
<i>Plaintiff</i> ,	)	
	)	<u>Hon. James L. Robart</u>
v.	)	Judge Presiding
	)	Hon.
AVVO, INC.,	)	<u>Magistrate Judge</u>
<i>Defendant</i> .	)	Jury Trial Demanded

**AFFIDAVIT OF OBJECTION**

I, *plaintiff* Andrew U. D. Straw, made a recusal motion under 28 U.S.C. § 144, which was denied, but more facts have come to light and I must file an objection:

1. Judge Robart was the presiding judge in my lawsuit against Avvo for lying about my Virginia bar membership not being in active in good standing status for several years when it was.
2. This lawsuit would never have taken place if Avvo had simply paid the arbitration fee and done arbitration as required of me in the TOS of Avvo. JAMS Reference: **1100107062**
3. Avvo avoided arbitration by not paying the fee for it. That caused me to have to come to this Court for relief under some theory to address the *Avvo lying* about my Virginia law license using the

wires, the Internet. Harassing a federal attorney is a very serious matter and lying about bar membership is harassment. 18 U.S.C. § 1503(a):

“Whoever corruptly \* \* \* endeavors to influence, intimidate, or impede any \* \* \* officer in or of any court of the United States \* \* \* in the discharge of his duty \* \* \* or injures any such officer \* \* \* in his person or property on account of the performance of his official duties, or corruptly or by threats or force, or by any threatening letter or communication, influences, obstructs, or impedes, or endeavors to influence, obstruct, or impede, the due administration of justice, shall be punished as provided in subsection (b)

4. <https://www.law.cornell.edu/uscode/text/18/1503>
5. I asked Perplexity.ai to explain how lying about a state law license's active status (saying it is not for 3 years) may violate a federal court-admitted attorney's protections under 18 U.S.C. § 1503(a). I include the answer as **Exhibit 6**.
6. The U.S. Department of Justice says this criminal law includes private attorneys admitted to federal court bars:

Because 18 U.S.C. § 1503 applies to civil, as well as criminal judicial proceedings, *Roberts v. United States*, 239 F.2d 467, 470 (9th Cir. 1956); *Sneed v. United States*, 298 F. 911, 912 (5th Cir.), *cert. denied*, 265 U.S. 590 (1924); *see Nye v. United States*, 137 F.2d 73 (4th Cir.) (by implication), *cert. denied*, 320 U.S. 755 (1943), private attorneys are, arguably, also covered by the statute.

<https://www.justice.gov/archives/jm/criminal-resource-manual-1721-protection-government-processes-obstruction-justice-scope-18-usc#:~:text=Section%201503%20of%20Title%2018,intimidate%20or%20impede.%22%20Section>

7. Avvo was owned by a huge investment group known as KKR.
8. However, when I took my appeal to the 9<sup>th</sup> Circuit, counsel for Avvo failed to state in its FRAP Rule 26.1 disclosure that Avvo is owned by KKR. I raised this omission of who owns Avvo, the largest lawyer directory in the USA, but the 9<sup>th</sup> Circuit did not punish counsel for Avvo for that omission.
9. That was a material omission and I will explain why.
10. With my appeal at the 9<sup>th</sup> Circuit open in 2021, Judge Robart bought stock in a company called Rackspace Tech. **Exhibit 1** is Judge Robart's financial disclosure annual report and it shows this purchase. Judge Robart also owned investments in Upstart Holdings and Balbec V L.P.
11. KKR is a major investor in Rackspace Tech. I asked Perplexity AI to explain the connection between KKR and Rackspace Tech. I offer this as Exhibit 2.

12. There are also links between Upstart Holdings and KKR as well as Balbec V L.P. and KKR. Exhibits 3 & 4.

13. So, Avvo by counsel was hiding the fact that KKR owns the largest lawyer directory and Judge Robart refused to recuse when his clerk went to work for DWT. Instead of recusing, Robart was buying stock in a company in which KKR invests heavily.

14. When I asked Perplexity AI to explain the ethical and Due Process problems from an external perspective, it found ethical and Due Process problems. I provide that analysis in **Exhibit 5**.

15. Judge Robart never disclosed anything about these investments in my case against Avvo.

16. Hon. Robart never made a disclosure that his law clerk was being hired by opposing counsel.

17. He never ORDERED his law clerk, hired into the “**litigation group**” of DWT, Avvo’s counsel, not to be involved in my Avvo case.

18. These entanglements have caused me to make an FTCA claim with the Administrative Office of U.S. Courts for failure to provide me Due Process through these **administrative and private entanglements between Avvo and this Court**.

19. But notice of these entanglements needs to appear in this case itself because Avvo has lied about me and my law licensure in Virginia. Avvo lied about its ownership by KKR to the 9<sup>th</sup> Circuit U.S. Court of Appeals itself. And now I found that the judge was apparently feeding from the same trough by buying an obscure little company's stock that was connected to KKR.

20. It's not a good look when a judge and his law clerk are so intimately connected—entangled—through employment and investments with *one side of a dispute*.

21. It looks to me and to Perplexity AI that this Court was biased against me, and the result followed. No recusal happened when it should have and Avvo was allowed to lie about my professional law license for 3 years without any punishment.

22. This Avvo directory can, because of this Court, lie about any federal court-admitted lawyer in the United States regarding their state law licensures without any possibility of relief. And that directory is owned by a huge conglomerate worth billions of dollars that apparently wants its connections to this to be *secret*.

23. This stinks of anti-trust, unethical influence on the entire legal profession in the United States, and obstruction or even attorney harassment, since I am a federal court admitted attorney, admitted to the bar of the Fourth Circuit U.S. Court of Appeals (1999-2025 with no sanctions at all during that entire time).

24. This U.S. District Court has a very special position in the legal profession in the entire country. It can either allow the largest lawyer directory to act dishonestly and lie about law licensure and entangle itself with Avvo and KKR with this Court, its judges, and its law clerks, or it can hold that lawyer directory to account when it misbehaves.

25. I cannot remain silent about the lies. Some of the people who engaged in these acts were attorneys and so I bring the ethical violations to the Court under **ABA Model Rule 8.3**, which requires me to do so given I am an attorney at the U.S. Court of Appeals for the Fourth Circuit.

26. If this Court felt this situation requires some remedy, I would be willing to amend my complaint to make it a **breach of contract case** given Avvo completely failed in its TOS obligations by not

paying the arbitration fee, avoiding the forum *it chose*. But given the procedural posture of this case, I would need the Court to act *sua sponte* and give me permission to change this into a breach of contract case. Avvo violated that TOS less than 6 years ago, so there is no Washington State statute of limitations issue given I have 6 years from the breach to sue.

Further, *affiant* sayeth not.

I, *plaintiff* Andrew U. D. Straw, verify that to the best of my knowledge, information, and belief, formed after an inquiry reasonable under the circumstances and to the best of my knowledge, that the above statements and factual representations are true and correct on penalty of perjury. **July 16, 2025**

Respectfully submitted,

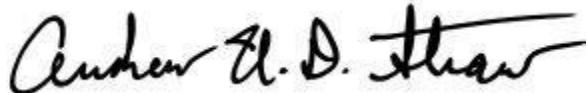


s/ ANDREW U. D. STRAW  
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**CERTIFICATE OF SERVICE**

I, Andrew U. D. Straw, certify that I filed the above **AFFIDAVIT OF PROTEST** and **6 EXHIBITS** with the Clerk of this Court via CM/ECF on **July 16, 2025**, and this will be served to all counsel of record through that CM/ECF system. It will be available to the public via Pacer.gov.

Respectfully submitted,



s/ ANDREW U. D. STRAW, *Pro Se*  
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**EXHIBIT LIST**

- **Exhibit 1** – Financial Disclosure Form of Judge Robart, 2021
- **Exhibit 2** – Perplexity AI Analysis of KKR & Rackspace Tech
- **Exhibit 3** – Perplexity AI Analysis of KKR & Upstart Hldgs
- **Exhibit 4** – Perplexity AI Analysis of KKR & Balbec V L.P.
- **Exhibit 5** – Perplexity AI Analysis of Ethics & Due Process Here
- **Exhibit 6** – Perplexity AI Analysis of Lies About State Law  
Licensure and 18 U.S.C. 1503(a)